

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Lead Case]

TREY MARTINEZ FISCHER'S PRETRIAL DISCLOSURES

Plaintiff Trey Martinez Fischer hereby submits the following Pretrial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Pretrial Scheduling Order (Dkt. 880). Plaintiff Trey Martinez Fischer reserves the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants Pretrial Disclosures, as appropriate.

I. Witnesses

Trey Martinez Fischer's Witness List is set forth in Exhibit A attached hereto. Plaintiff does not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial. Accordingly, Plaintiff reserves the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments. Plaintiff's identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants. Trey Martinez Fischer also intends to largely rely upon the testimony elicited from other Plaintiffs and call their witnesses concurrently for such purposes.

II. Exhibits

Plaintiff's Preliminary Trial Exhibit List is set forth in Exhibit B attached hereto. Plaintiff

reserves the right to introduce in evidence any documents identified by Defendants or any other plaintiff in their Pre-Trial Disclosures and to introduce additional documents as rebuttal or impeachment evidence. Plaintiff reserves the right to amend its list of trial exhibits based on the outcome of those pending motions.

Dated: May 2, 2025

Respectfully submitted,

/s/ Martin Golando

Martin Golando

SBN: 24059153

The Law Office of Martin Golando, PLLC

2326 W. Magnolia Ave.

San Antonio, Texas 78001

Martin.Golando@gmail.com

210.471.1185

Attorney for Trey Martinez Fischer

CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 2nd day of May 2025, by email.

/s/ Martin Golando

Martin Golando